

EXHIBIT G

Published Notice Plan Overview and Approach

**Goidel v Aetna, 1:21-cv-07619
Settlement**



Class Action Administration

Media Plan Summary and Options
Aetna Settlement

Commonly Used Media Terms

Target Audience: Net number of persons or different persons exposed to a media vehicle. It is larger than a publication's circulation because it includes pass along readers who may obtain the publication second hand, and through indirect means.

Frequency: Estimated average number of times a population group is exposed to a media vehicle or combination of media vehicles containing a notice within a given time period.

Impressions or Exposure: Total number of opportunities to be exposed to a media vehicle or combination of media vehicles containing notice. It is a gross or cumulative number that may include the same person more than once. Impressions can exceed the total target market population size based on multiple exposure by any given time period.

Reach or Coverage: Net percentage of a specific population group or target audience exposed to a media vehicle or a combination of media vehicles containing a notice at least once within a given time period. Reach factors out duplication, representing the total of different net persons.

Selectivity Index: Shows the concentration of a specific population group relative to the general adult population. For planning purposes an index score of 100 is to be considered good. Any number over 100 is considered as better level of concentration versus the general population. We look for high index numbers for target and micro targeting our audience for notice plan purposes. Target Audience: Net number of persons or different persons exposed to a media vehicle. It is larger than a publication's circulation because it includes pass- along readers who may obtain the publication second hand, and through indirect means.





Media Resources Used

A leading cross-platform measurement company that precisely measures audiences, brands and consumer behavior everywhere. The ComScore 2000 is an index that measures traffic and index of audiences that visit the top 2000 websites on the internet.

The world's leading market intelligence information company, with over 40 years of data and data analysis tracking consumer and market trends across the world.

GfK is the trusted source of relevant market and consumer information that enables its clients to make smarter decisions. More than 13,000 market research experts combine their passion with GfK's long-standing data science experience. This allows GfK to deliver vital global insights matched with local market intelligence from more than 100 countries. By using innovative technologies and data sciences, GfK turns big data into smart data, enabling its clients to improve their competitive edge and enrich consumers' experiences and choices.

MRI is a nationally accredited research firm that provides consumer demographics, product and brand usage, and audience/exposure in all forms of advertising media. Established in 1979, MRI measures the usage of nearly 6,000 products and services across 550 categories, along with the readership of hundreds of magazines and newspapers, internet usage, television viewership, national and local radio listening, yellow page usage, and out of home exposure. Based on yearly face to face interviews of more than 26,000 customers in their homes MRI's survey of the American Consumer is the primary source of audience data for the US Consumer magazine industry and the most comprehensive and reliable source of multimedia data available.



Audience Population Estimates for Potential Aetna Class

Campaign Objectives:

78% reach into target audience, on a 4 times frequency informing unknown class of its rights and options under the settlement.

Basic Plan Assumptions:

- Awareness campaign for LGBTQ Class Members who sought insurance coverage from Aetna for fertility healthcare services and were denied coverage.
- Campaign search terms, social media platforms, may be coupled with other types of products to ensure broadest possible reach into target audience for notification.
- Building a social community on Facebook, Reddit, and other agreed-upon social media platforms concentrating on the following online outlets: NY Times, Gothamist, WNYC/Gothamist, Times Union, Buffalo Spree, Democrat & Chronical, The Advocate, Go Magazine, Gay City News, Gay Parent Magazine, Parents Magazine and Aetna searches.

Highest Indexing for Audience For Media Planning Purposes

- Audiences with household incomes above \$55,000 to \$250,000.
- Heavy newspaper and internet consumers (92% regularly consume information from the internet).
- 82% visit at least two websites for purchase information or to gather news and information.
- Demographic profile will consist of members of the LGBTQ community, and focus on searches associated with fertility treatments, becoming parents, same-sex parenting, parenting issues.
- Combining profiling of known class to internet and social media platforms –data analysis.
- 97% according to the PEW Research Center, with household incomes greater than \$55,000 use the internet frequently.

Target Audience Analysis

Since the purchase and financing of common consumer brands either through the internet or through a direct sales environment, is not specifically measured in our syndicated data search, a broad **GfK MRI demographic** profiling is used to profile an over inclusive target group. In this case a Tri-State (NY, NJ, CT) adult population, between the ages of 23-54, in a committed relationship, and seeking or are of childbearing ages, who purchased healthcare insurance or related products, and sought fertility or related services, are members of the LGBTQ community, with a household income over \$55,000 but under \$250,000. Those fitting the demographic profile of a purchaser/finance consumer- is **458,000** adults between the ages of 23-54.

Knowing the characteristics, the purchasing patterns, media consumption, interests and habits of the target audience of Class Members aids in our media selection process and planning for targeting and social media ad purchases.

Class Members

Those LGBTQ community members who sought coverage for fertility and insemination treatments to have a child but were denied coverage in New York during the Class Period.

Demographic Highlights-MRI GfK Data Set For Media Planning Purposes (Red indicates our target focus for advertising)

- The Target audience will focus on a consumer in committed LGBTQ relationships, and of childbearing age.
- Highest potential targets will be the Gen-X Market (48%) - followed by Millennials (53%).
- Income ranges of our Target audience is \$55,000 to \$250,000.
- Average education level, with 62% having completed at least one year of college, and 82% having a high school degree.
- Heavier concentration in rural or suburban areas over major metropolitan areas.

Media Consumption-CommScore2000

CommScore2000 is a source that tracks the web traffic for the top 2000 websites on the internet, which accounts for more than 85% of all internet traffic in the United States. Once engaged, we will provide the top 10 websites that our target audience will visit for purchase information, and our plan will be concentrated on ad placement for those sites. Identified platforms of interest includes the following platforms: **NYT, WNYC/Gothamist, Times Union, Buffalo Spree, Democrat & Chronicle, The Advocate, Go Magazine, Gay City News, Gay Parent Magazine, Parents Magazine.**



Media Consumption of our Target Audience

Gen-X and Millennial

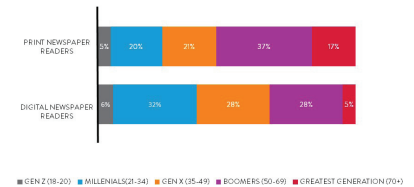
- **Facebook** reach is strong
72% of Adults, with heavy concentration within our targets use FACEBOOK.
82% of those 18-29
79% of those 30-49
64% ages 50-64
78% of individuals in households of HHI \$75k+ are on Facebook
- **Mobile Device** Reach a Must for Notification Effort
47% of Adults live in a household with mobile only internet access.
92% of Adult population has a cell phone.
92% use Mobile device for internet access when conducting purchase research.
- 97% of adults with access to the internet use **Search Engines**
76% use Google
20.7% use Bing
10% use Yahoo

Newspaper Readership is heaviest among the Gen X population, and least among the Millennial Market according to the PEW Research Center.

- 20% of the Millennial Market reads a print Newspaper as compared to 32% who read an online version.
concentration among the demographic groupings.
- Social Media Platforms and local news platforms is still the preferred choice for local news-75% read a local community paper.



PRINT AND DIGITAL NEWSPAPER READERS BY GENERATION



Source: Nielsen/Comcast USA+ Release 2016

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Average Time Spent per Day with Major Media by US Adults, 2011-2017

Media	2011	2012	2013	2014	2015	2016	2017
Digital	3:34	4:19	4:48	5:09	5:29	5:45	5:54
Mobile (includes)	0:41	1:28	2:15	2:37	2:54	3:08	3:18
Radio	0:16	0:20	0:22	0:23	0:24	0:25	0:25
Social networks	0:06	0:09	0:16	0:23	0:27	0:30	0:32
Video	0:03	0:09	0:17	0:22	0:26	0:29	0:32
Other	0:23	0:44	1:08	1:16	1:17	1:20	1:22
Desktop/laptop	2:30	2:24	2:16	2:14	2:12	2:11	2:10
Video	0:10	0:20	0:22	0:23	0:24	0:25	0:25
Social networks	0:01	0:02	0:07	0:16	0:15	0:14	0:13
Radio	0:12	0:07	0:06	0:06	0:06	0:06	0:06
Other	1:45	1:10	1:01	1:06	1:07	1:06	1:05
Other connected devices	0:18	0:18	0:17	0:19	0:21	0:23	0:23
TV	4:34	4:38	4:31	4:22	4:11	4:03	3:58
Radio	1:04	1:02	1:00	1:00	1:02	1:00	1:04
Print	0:46	0:40	0:35	0:32	0:30	0:28	0:27
News/updates	0:28	0:24	0:20	0:18	0:17	0:16	0:15
Magazines	0:10	0:17	0:15	0:13	0:12	0:12	0:11
Other	0:39	0:38	0:31	0:24	0:24	0:22	0:21
Total	11:08	11:39	11:55	11:57	12:00	12:04	12:05

Growth of Average Time Spent per Day with Major Media by US Adults, 2011-2017

Media	2011	2012	2013	2014	2015	2016	2017
Digital	91.0%	10.7%	11.0%	7.4%	4.5%	4.7%	3.1%
Mobile (includes)	94.6%	90.6%	53.1%	10.8%	11.3%	7.9%	5.2%
Video	238.6%	218.0%	99.9%	25.8%	20.4%	11.5%	7.8%
Social networks	309.6%	162.2%	87.4%	26.8%	17.9%	11.8%	7.9%
Radio	53.3%	61.9%	20.2%	21.6%	15.6%	9.2%	6.6%
Other	49.3%	87.2%	56.2%	7.8%	4.4%	4.4%	2.3%
Desktop/laptop	7.7%	-3.9%	-5.4%	-1.8%	-2.0%	-1.0%	-1.0%
Video	115.4%	48.2%	8.1%	7.4%	4.5%	1.7%	1.1%
Radio	19.6%	42.0%	17.4%	3.4%	3.2%	0.7%	0.2%
Social networks	20.6%	3.0%	21.2%	7.2%	4.2%	5.4%	4.7%
Other	2.6%	0.1%	4.4%	2.7%	1.4%	0.8%	0.7%
Other connected devices	4.0%	-1.5%	-0.3%	10.0%	21.2%	13.6%	8.4%
TV	-2.1%	-2.1%	-2.0%	-1.9%	-1.8%	-1.7%	-1.7%
Radio	3.8%	1.5%	-2.5%	-3.5%	-4.1%	-3.1%	-2.1%
Print	-11.5%	-13.1%	-13.1%	-9.1%	-6.2%	-5.3%	-4.3%
News/updates	-10.0%	-11.1%	-12.5%	-8.1%	-6.0%	-5.0%	-3.9%
Magazines	-13.4%	-13.8%	-14.1%	-14.6%	-9.7%	-5.4%	-4.2%
Other	-13.2%	-3.3%	-18.7%	-14.5%	-7.3%	-4.8%	-4.4%
Total	4.7%	4.7%	2.2%	0.2%	0.2%	0.6%	0.2%

Go-To-Market Strategy

Overview

Based on our research, Atticus recommends a mix of **digital notice banners and purchased Google search terms**, (mobile and desktop), **social media**, including a dedicated **Facebook** page along with Reddit, **Instagram** and **TikTok** targeted ads, to supplement the direct mail Notice to ensure proper reach into the target audience. Ad placement will be a regional concentrated to the Class demographic which will be emphasized to targets generated from Data File analysis and potential geographic areas of concentration.

Plan Delivery

The combination of verifiable impressions from published notice, digital notice banner ads, paid search and organic search terms, and social media, optimized to drive traffic to the Settlement Website with online claims filing capability. The website will have detailed information about the Class Member's rights and options. **Our Media Notice Plan will reach approximately 78%+ of the likely Class Members on an average of 4x times frequency, for an estimated 3 to 6 million impressions.**

Campaign Launch

In addition to direct mail notice and digital published notice, Atticus recommends **a Press Release be issued announcing the Settlement** to targeted platforms that Class Members will most likely read or follow, either in print or online. In some instances, Atticus may choose to pay for placement in target websites or news outlets to supplement reach efforts.

Schedule

The Notice campaign will commence after Preliminary Approval and shall continue for a 90-day period thereafter, during the claims filing period.

Additionally, our plan includes a **Settlement Website** with claims filing capability that will be linked through the digital notice campaign. The website will also provide the full Notice, key filing dates, Court documents, FAQs, and contact information such as Settlement email, address, and 1-800# toll-free line.

Media Channel Considerations:

- **Digital Notice – Mobile & Desktop**
 - Display Banner Ads - Programmatically optimized to hit 2 to 5 of the top ten websites visited by our target audience
 - Paid Search - Keyword advertising (Google, Yahoo, etc.)
 - Social Media (Facebook, X, Instagram, TikTok, etc.. Or TBD)
 - CommScore 2000 Banner Ad placement

